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August 17, 2020

VIA ECF

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Hernan Lopez, et al.
Criminal Docket No. 15-252 (S-3) (PKC)

Dear Judge Chen:

The defendant, Full Play Group S.A. ("FPG"), submits this letter respectfully requesting that the Court revise the date for the oral argument and status conference scheduled for September 2, 2020 per the order issued by Your Honor on July 21, 2020 (the "July 21 Order"). The July 21 Order set forth a briefing schedule and oral argument date pertaining to Defendants Hernan Lopez and Carlos Martinez's Motion for Severance and to Strike Certain Language in the Indictment filed on July 6, 2020 (Dkt. No. 1408) and FPG's response to same filed on July 24, 2020 (Dkt. No. 1423) (collectively, the "Severance Motions"). Pursuant to the present briefing schedule, the Government filed its response to the Severance Motions on August 12, 2020 (Dkt. No. 1429) and the Defendants' replies are due no later than August 26, 2020. The Court also scheduled oral argument, if any, and a status conference for September 2, 2020 ("Oral Argument").

Having recently learned of a potential conflict with the Oral Argument scheduled for September 2, 2020 and upon conferring with the government on August 16, 2020, the parties have agreed upon the following proposed Oral Argument date/time: afternoon of September 8, 2020. Counsel for Lopez and Martinez, who on August 14 and 16, 2020 were conferred with, have no objection to this proposed revision. Accordingly, Defendant FPG respectfully requests that the Court grant the proposed revised Oral Argument date and time. We thank the Court for its consideration of this request and we remain at the Court's disposal should Your Honor have any questions or concerns.

Respectfully,

/s/ Carlos F. Ortiz

Carlos F. Ortiz

CFO:MCB:KF/ck

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cc: Counsels of record (via ECF)
Clerk of Court (PKC) (via ECF)